



State of Utah

Department of  
Environmental Quality

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**MEMORANDUM**

**TO:** Air Quality Board

**FROM:** Robert W. Ford, Hazardous Air Pollutants Section Manager

**DATE:** June 1, 2006

**SUBJECT:** Final Adoption: Amendments to R307-801, Asbestos.

On February 1, 2006, the Board proposed for public comment amendments to R307-801 that allow contractors that remove asbestos from buildings to notify DAQ of their plans through an electronic notification system, as well as the current in-person and mailed system. A public hearing was held on March 23; no comments were received.

During the comment period, one written comment was received.

**COMMENT:** At the Provo Library I saw a notice to require buildings which have asbestos to do more notification than is currently required because of the health hazard of asbestos. I wanted to write you and put in my comment that I learned in my mineral course at college that there are three separate types of asbestos, classified as blue, brown, and white. Blue and brown asbestos have been proven to cause cancer. Because of their rod shaped mineral structure they lodge in lung tissue and are difficult to extricate. Blue and brown asbestos, however, are used almost exclusively in shipbuilding, not currently a major industry of Utah to the best of my knowledge. White asbestos, the kind used in most buildings, has curly fibers that do not penetrate lung material and do not seem to affect health significantly. The geology textbook I was using (the title of which I do not recall) noted that the incidence of cancer in Canadian miners of white asbestos was lower than the general public (while noting a significantly higher rate of cancer in miners of blue and brown asbestos). In short, it seems a terrible waste of time and money to put in extra laws requiring further regulations on a substance that is not particularly dangerous for the general public. (Bryce Shelley)

**Response:** The amendment does not require any additional notification to DAQ, it allows contractors to notify their projects electronically if they wish to do so. The rule does not require removal of asbestos from buildings, but sets safety requirements that must be followed if asbestos is removed.

Mr. Shelley is incorrect in saying that the asbestos generally used in buildings does not affect public health. All three types of asbestos (Amosite (brown), Crocidolite (blue) and Chrysotile (white)) are found in Utah buildings and all are known to cause cancer. There is no regulatory difference found in current USEPA and Utah DAQ rules between the three types of asbestos.

**Staff recommendation:** Staff recommends that the rule changes be adopted as they were proposed.